

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

HINO MOTORS MANUFACTURING
U.S.A, INC.,

Plaintiff,

v.

CHRIS HETMAN, TODD SHEPLEY,
BRUCE SCHROEDER, JOHNATHAN
BOYER, and BOYER CONSULTING,
LLC,

Defendants.

Case No.: 2:20-cv-10031

Consent Motion to Modify Scheduling Order

Plaintiff Hino Motors Manufacturing U.S.A., Inc., through counsel, moves to modify the scheduling order (D.E. 30) to extend several deadlines in light of the Court's order granting Defendant Hetman's attorneys' motion to withdraw from this case.

On May 26, 2021, the Court granted the motion by counsel for Defendant Hetman—Daniel Schouman and David Kramer—to withdraw from representing him in this case. (D.E. 46; *see* D.E. 43.) The Court granted Hetman thirty days to seek new counsel, and another thirty days after counsel's appearance in this case to file responses to Hino's pending motions for leave to file an amended witness list (D.E. 37), to seal (D.E. 38), and for sanctions (D.E. 39). Hetman's responses may now be filed as late as July 26, 2021. (*See* D.E. 46 at 2.) Consequently, the parties will need more time to draft and respond to dispositive motions and prepare for trial.

Plaintiff therefore requests that the Court modify the deadlines in Paragraphs 4, 6, 7, and 11 of the scheduling order as follows:

Dispositive Motion filing cut-off date: **9/3/2021**

Date and time for Final Pretrial/Settlement Conference: **12/22/2021**

Final Pretrial Order to be submitted to the Court by: **12/15/2021**

Tentative Trial Term: **December 2021 – March 2022**

Defendant Hetman consents for the filing of this Motion. Plaintiff has included a proposed order along with this motion.

Filed May 28th, 2021.

Respectfully submitted,

/s/ J. Michael Honeycutt, Esq.

J. Michael Honeycutt (MI Bar # P60517)

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ATTORNEYS FOR PLAINTIFF

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Certificate of Service

I hereby certify that on May 28th, 2021, the foregoing document was filed with the Clerk of the Court using the CM/ECF system, which will serve it on the attorneys of record. I further certify that on the same date, I sent the foregoing document to Defendant Chris Hetman, who is currently not represented by counsel, via first class mail.

/s/ J. Michael Honeycutt, Esq.
J. Michael Honeycutt
ATTORNEY FOR PLAINTIFF